

## break o'day catchment risk group

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Environmental Policy Section  
Environment Division  
134 Macquarie Street  
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15 April 2008

Dear Sir,

**Submission on Draft Guidelines for Slipways (Tasmania 2008)**

The current Tasmanian Acts and regulatory framework exist to ensure that contaminated wastes do not enter marine waters. The guidelines on how to approach marine water quality are detailed in the National Water Quality Management Strategy. Current “best practice” approaches to risk assessments (to allow regulated substances to be used in the environment) mean that substances have to be demonstrated to be safe. The EU takes this approach to regulatory management. The current approach in Tasmania means however, that substances have to be demonstrated to be unsafe before any action is taken to stop or curtail their use. This is unacceptable to all water users, and food consumers.

Prompt action requires to be taken to clean up the present contaminated sites. Anti-fouling products, including paints, should not be used if they may cause a threat to the marine environment. Research from other countries should be used in risk assessments. Diuron has been reviewed for many years by APVMA, and is banned in the EU. It cannot be seen, with this background information, as an emerging issue. All biocidal products need to be assessed according to their possible threat to the marine environment and dealt with accordingly.

Contaminated wastes should not be allowed to continue to pollute marine or estuary waters. The current regulations to effect this need to be implemented, policed and enforced as soon as possible.



Dr Alison Bleaney OBE

Sec BODCRG – a group affiliated to The National Toxic Network